

IN THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON

UNITED STATES OF AMERICA

v.

CRIMINAL NO. 2:21-cr-00127

RAYMOND DUGAN

MOTION OF THE UNITED STATES
FOR EXTENSION OF TIME TO FILE RESPONSES AND
FOR A CONTINUANCE OF THE PRETRIAL MOTIONS HEARING

Comes now the United States of America, by Julie M. White, Assistant United States Attorney for the Southern District of West Virginia, and respectfully requests an extension of time in which to file Responses to “Defendant’s Motion to Compel Discovery” and “Defendant’s Motion to Suppress” that were filed under seal on April 11, 2022, as well as a brief continuance of the Pretrial Motions Hearing currently scheduled for April 21, 2022.

1. An Indictment was filed against Defendant on July 29, 2021, charging him with possession of child pornography, in violation of 18 U.S.C. § 2252A(a)(5)(B).

2. On Monday, April 11, 2022, defense counsel filed the above-referenced Motion to Compel Discovery and Motion to Suppress.

3. The United States intends to respond to these Motions, but will need to coordinate with outside agencies to do so. This case involves an ongoing nationwide investigation.

4. The undersigned is currently out of town on a prepaid trip with her family and will not be returning until Monday, April 18, 2022.

5. The undersigned has reached out to Mr. Schles, counsel for Defendant, and he does not object to the granting of an extension of time in which to respond to said Motions, nor does he object to a continuance of the Pretrial Motions Hearing currently scheduled for April 21, 2022.

WHEREFORE, the United States respectfully requests the Court to extend the deadline to respond to these Motions until April 28, 2022, and to reset the Pretrial Motions Hearing for a date convenient to the Court.

Respectfully submitted,

WILLIAM S. THOMPSON
United States Attorney

/s/Julie M. White
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CERTIFICATE OF SERVICE

It is hereby certified that the foregoing "Motion of the United States for Extension of Time to File Responses and for a Continuance of the Pretrial Motions Hearing" has been electronically filed and service has been made on opposing counsel by virtue of such electronic filing this the 15th day of April, 2022, to:

David Schles
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